

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	C.A. No. _____
v.)	
)	Judge _____
ALCOA, INC., et al.)	
)	
Defendants.)	
)	

NOTICE OF LODGING OF CONSENT DECREE

The United States respectfully provides notice of the lodging of the attached proposed consent decree in the above-captioned action. No action is required by the Court at this time on this Consent Decree, or the accompanying complaint. The consent decree is subject to a thirty-day public comment period, and therefore, should *not* be entered until the United States moves this Court for entry, which will occur only after the public comment period expires, and the United States has received and reviewed any comments submitted. The United States also reserves the right to not move for entry, or to modify the consent decree, if appropriate, based upon the public comments.

This proposed consent decree, if entered, would resolve the liability of the named defendants at the Cam-Or Superfund Site, located in Westville, LaPorte County, Indiana. Under the Decree, the named Defendants have agreed to perform the remedial action for the Cam-Or Site, and to pay certain of the United States' and Indiana's response costs incurred and to be incurred in connection with the Site. The complaint accompanying this consent decree alleges that each of the named Defendants is liable under Sections 106(a) and 107(a) of CERCLA for the


United States' response costs as an arranger for the treatment and/or disposal of hazardous substances at the Cam-Or Site.

WHEREFORE, the United States requests the Court to lodge this Consent Decree, but **not** to act upon the Decree until the United States moves for entry, which should occur no earlier than mid-February, 2011.

Respectfully submitted,

ROBERT G. DREHER
Acting Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice

Date: 12/22/10

By: 
LISA A. CHERUP
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
Ben Franklin Station
P.O. Box 7611
U.S. Department of Justice
Washington, DC 20044
Tel.: (202) 514-2802

WAYNE T. AULT
Assistant United States Attorney
Northern District of Indiana
U.S. Department of Justice
South Bend, Indiana

OF COUNSEL:

JEROME KUJAWA
Associate Regional Counsel
U.S. Environmental Protection Agency
77 W. Jackson Blvd. (C-14J)
Chicago, IL 60604

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Notice of Lodging and Proposed Consent Decree were served on this date by first-class mail, postage prepaid upon the following individuals:

Liaison Counsel for the Cam-Or Work Group

Dennis Reis
Briggs and Morgan, P.A.
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
DReis@Briggs.com

Jeffrey W. Styron
Environmental Counsel
500 Water Street, 5150
Jacksonville, FL 32202

For Ford Motor Company

CT Corporation
251 East Ohio Street. Suite 1100
Indianapolis. IN 46204

For Alcoa, Inc.

Dan J. Jordange
Counsel
Hunton & Williams LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219

For Imperial Oil Ltd.

Patricia H. Forrest
Senior Counsel
Imperial Oil Limited
Law Department
237 4yh Avenue, SW, Calgary, AB
Canada T2P 3M9

For ANR Pipeline Company

The Corporation Trust
1209 Orange Street
Wilmington, Delaware 19801

For Clark Equipment Company

Aaron Kleinbaum
VP-Environment, Health & Safety and
Deputy General Counsel
One Centennial Avenue
Piscataway, NJ 08854

For Safety-Kleen/Clean Harbors Environmental Services, Inc.

Michael R. McDonald. Esquire
Senior Vice President & General Counsel
Clean Harbors Environmental Services. Inc.
42 Longwater Drive
Norwell, MA 02061-9149

For Northern Indiana Public Service Company

Daniel J. Deeb
Partner
Schiff Hardin LLP
233 S. Wacker Drive, Suite 6600
Chicago, Illinois 600116

For Consolidated Rail Corp.

Jonathan M. Broder
VP-Corp. Development & CLO
Conrail
1717 Arch Street, 32nd Floor
Philadelphia, PA 19103

For Rockwell Automation

Gary Ballesteros
Vice President. Law
1201 South Second St.
Milwaukee, WI 53204

For CSX Transportation, Inc.

For C. Stoddard & Sons., Inc. (n/k/a Egil Corporation)

Richard S. Baron Esq.
Attorney, Foley Baron & Metzger PLLC
38777 Six Mile Road
Suite 300
Livonia, MI 48152

For Tennessee Gas Pipeline Company

Dan Schnee
Senior Counsel

For Indiana Attorney General's Office

April Lashbrook
Deputy Attorney General
Office of Indiana Attorney General
302 W. Washington St., 5th Floor
Indianapolis, IN 46204
april.lashbrook@atg.in.gov

For Indiana Department of Environmental Management

Barb Lollar
Office of Legal Counsel
Indiana Department of Environmental Management
100 North Senate Ave.
MC 60-01 ICGN 1307
Indianapolis, IN 46204
blollar@idem.in.gov

For USEPA

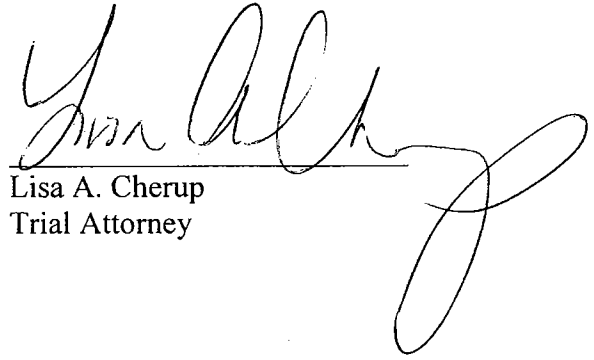
Jerome Kujawa
Office of Regional Counsel
77 West Jackson Blvd. (C-14J)
Chicago, IL 60640

2 North Nevada Avenue
Colorado Springs, CO 80944

For United States Steel Corporation

Andrew G. Thiros
Attorney-Environmental
600 Grant Street
Suite 1500
Pittsburgh, PA 15219

Date: 12/22/10



Lisa A. Cherup
Trial Attorney